

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

)	
In the Matter of)	MB Docket No. 04-261
)	
Violent Television Programming)	
And Its Impact on Children)	

Reply Comments of

THE CHILDREN’S MEDIA POLICY COALITION

Children Now
American Psychological Association
Action Coalition for Media Education
American Academy of Child and Adolescent Psychiatry
Benton Foundation
National Institute on Media and the Family
National PTA
Office of Communication of the United Church of Christ, Inc.

1212 Broadway, Fifth Floor
Oakland, CA 94612
(510) 763-2444

Reply Comments of THE CHILDREN’S MEDIA POLICY COALITION

I. INTRODUCTION

Children Now, the American Psychological Association, Action Coalition for Media Education, the American Academy of Child and Adolescent Psychiatry, the Benton Foundation, the National Institute on Media and the Family, the National PTA and the Office of Communication of the United Church of Christ, Inc. (hereafter “Children’s Media Policy Coalition” or “Coalition”) hereby submit Reply Comments to the Federal Communications Commission (“Commission” or “FCC”) in the above-docketed Notice of Inquiry (“NOI”).

The Coalition responds to comments filed in the above-mentioned docket that claim there is insufficient scientific evidence to conclude media violence increases the risk of harmful effects in children, including an increase in aggressive behavior and reasserts its position that the overwhelming majority of evidence on this matter clearly points to an effect of media violence on aggressive behavior. A brief review of scientific research in this field, as well as a critique of one outspoken critic, serves to support this position.

The Coalition also maintains that the television ratings system and the V-chip are useful tools for parents and reinforces our previous recommendations that the Commission should work with the television industry to ensure that both systems are improved in ways that will better serve parents’ needs. Two ways the Coalition suggests this may be done is through public education campaigns to raise awareness of these resources and the creation of an open V-chip to allow parents even greater opportunities to find appropriate programming for their children. The Coalition asserts that these steps

will be effective means of assisting parents in their efforts to protect their children from inappropriate and potentially harmful content.

II. IT IS WELL-ESTABLISHED THAT DEPICTIONS OF VIOLENCE ON TELEVISION CONTRIBUTES SIGNIFICANTLY TO THE RISK OF HARMFUL EFFECTS IN CHILDREN

Despite claims in some comments that research studies do not demonstrate a causal relationship between exposure to television violence and aggression¹ research firmly establishes that depictions of violence on television contribute significantly to the risk of harmful effects in children.² As explained in comments filed in this proceeding by Dr. Craig Anderson of Iowa State University “[r]esearch on violent television and films, video games, and music reveals unequivocal evidence that media violence increases the likelihood of aggressive and violent behavior in both immediate and long-term contexts.”³ The claims made in some comments misconstrue the overwhelming conclusion of the most authoritative public health organizations and agencies in the country, as well as findings by Congress, and dismisses recent work that adds to the mountain of evidence.

Some of the comments mischaracterize the numerous studies by limiting the question to whether or not “watching violence on television causes watchers to commit violence.”⁴ To be clear, the conclusion is not that media violence is the sole cause of

¹ See e.g. Comments of The Media Associations (“MA Comments”), MB Dkt. No. 04-261, filed Oct. 15, 2004, at 13; Comments of the National Association of Broadcasters (“NAB Comments”), MB Dkt. No. 04-261, filed Oct. 15, 2004, at 7-8; Comments of the American Civil Liberties Union (“ACLU Comments”), MB Dkt. No. 04-261, filed Oct. 14, 2004, at 1.

² Paik, H., & Comstock, G. (1994). The effects of television violence on antisocial behavior: A meta-analysis. *Communication Research*, 21(4), 516–546.

³ Comments by Craig A. Anderson, Ph.D., Iowa State University of Science and Technology, MB Dkt. No. 04-261, filed Sept. 14, 2004.

⁴ ACLU Comments at 1. See also MA Comments at 13; NAB Comments at 7-8.

aggression in children, but that the depiction of violence in media is one factor that may contribute significantly to the risk that children will suffer a number of harmful effects. As the Coalition stated in its original comments, these harmful consequences include a belief that it is acceptable to behave aggressively and violently, increased desensitization towards violence in real life, a heightened fear of becoming a victim of violence, and a greater tendency for engaging in violent and aggressive behavior later in life.⁵

1. Research supporting causal relationship

The Coalition maintains that the overwhelming majority of research in this area indeed points to a causal relationship between viewing violent media and engaging in violent or aggressive behavior. In fact, according to surveys, over 80% of those who actually do research on this topic have concluded, based on the scientific evidence, that media violence *causes* aggression.⁶

Four types of research designs have been used to study the relationship between media violence and aggression: (1) experimental studies, (2) field experiments, (3) correlational studies and (4) longitudinal observational studies. Experimental studies have high internal validity and are useful for determining causation. In general, reviewers agree that experimental studies consistently show that viewing violent television causes

⁵ Comments of the Children's Media Policy Coalition ("Coalition Comments", MB Dkt. No. 04-261, filed Oct. 15, 2004, at 2-3 (citing J.P. Murray, *Television and Violence: Implications of the Surgeon General's Research Program*, 28 *American Psychologist* 472-78 (1973); National Institute of Mental Health, 1 *Television and Behavior: Ten Years of Scientific Progress and Implications for the Eighties* (1982); Kaiser Family Foundation, 3 *National Television Violence Study* (1998)).

⁶ Murray, J. P. (1984). Results of an informal poll of knowledgeable persons concerning the impact of television violence. *Newsletter of the American Psychological Association Division of Child, Youth and Family Services*, 7(1), 2. As referenced in Huesmann, L. R. & Taylor, L. D. (2003). "The case against the case against media violence." In: Gentile, D. A. (Ed.) *Media violence and children*. (In series *Advances in Applied Developmental Psychology*, I. Sigel, Series Ed.) Westport, CT: Praeger Publishing. Pps.107-130.

aggressive behavior.⁷ According to Huesmann and Taylor, experiments consistently have found that subjects exposed to media violence “behave more aggressively toward persons and toward inanimate objects. The effects occur for all children—from preschool to adolescence, for boys and girls, for black and white, and for normally aggressive or normally nonaggressive.”⁸ One shortcoming of experimental studies, however, is that it is often unclear whether their findings can be generalized to real life, non-experimental, situations.

Field experiments help clarify this issue since they are designed to observe subjects in their natural environments. Critics of these studies claim their findings are inconsistent and that bias may overestimate the effects of media violence.⁹ However, reviews of field experiments reveal that there is a consistent pattern of findings among well-conducted studies indicating that media violence causes harmful effects on viewers’ levels of aggression and self-control, especially for viewers with initial high levels of aggression. Findings of no causal relationship most often occur in studies that have serious methodological flaws. In addition, Friedrich-Cofer & Huston explain that the “overall bias of field experiments appears to be in the direction of underestimating the effects of television violence,”¹⁰ rather than overestimating them.

Researchers conducting correlational studies collect data about children in their natural environment without manipulating their exposure to media violence. The vast majority of correlational studies that are properly designed, implemented and analyzed

⁷ Friedrich-Cofer, L. & Huston, A. C. (1986). “Television Violence and Aggression: The Debate Continues,” *Psychological Bulletin* (100), No. 3, pp. 364-371.

⁸ Huesmann, L. R. & Taylor, L. D. (2003). “The case against the case against media violence.” In: Gentile, D. A. (Ed.) *Media violence and children*. (In series *Advances in Applied Developmental Psychology*, I. Sigel, Series Ed.) Westport, CT: Praeger Publishing. Pps.107-130.

⁹ Freedman, J. (1984). “Effects of television violence on aggressiveness.” *Psychological Bulletin*, 96, 227–246.

¹⁰ Friedrich-Cofer, L. & Huston, A. C. (1986) p.368.

have found that children who consume more media violence in their everyday lives behave more aggressively.¹¹ Some critics note that the correlations for these studies are often not very large, usually between 0.10 and 0.35.¹² However, “as Rosenthal (1986) has pointed out, a correlation of 0.3 with aggression translates into a change in the odds of aggression from 50/50 to 65/35 – not a trivial change when one is dealing with life-threatening behavior.”¹³

While correlational studies clearly show that there is a relationship between viewing violent media and viewers’ behavior in the real world, they do not indicate the direction of the relationship. Does viewing violent television affect violent behavior or do those who tend to be aggressive prefer to view violent television? As with experimental studies, longitudinal studies help identify the direction of causality and have shown that even over time, childhood viewing of media violence predicts adult aggressive behavior, regardless of the level of childhood aggression.¹⁴ According to Friedrich-Cofer & Huston, all longitudinal studies show some effect of early viewing of violent television on later aggression. Though some effects were small, there were “virtually no instances of negative relations between viewing and aggression. If the real relation were zero, one would expect an approximately equal number of positive and negative correlations.”¹⁵

2. Research Conclusions are Valid and Well-Supported

Given the overwhelming consensus within the scientific community that the research indicates a causal relationship between viewing television violence and

¹¹ Paik, H. & Comstock, G. (1994).

¹² Friedrich-Cofer, L. & Huston, A. C. (1986).

¹³ Huesmann, L. R. & Taylor, L. D. (2003).

¹⁴ Huesmann, L. R. & Taylor, L. D. (2003); Friedrich-Cofer & Huston (1986)

¹⁵ Friedrich-Cofer, L. & Huston, A. C. (1986), p. 370.

aggressive behavior, the Coalition strongly reasserts its previously-stated position that children who are exposed to violent programming face a higher risk of suffering from harmful consequences.

Numerous public health organizations have come to similar conclusions. The American Academy of Pediatrics, the American Medical Association, and the American Psychological Association have issued public statements warning about the harmful effects of violent media based upon this research. According to a recent study, 98% of pediatricians believe that viewing television can negatively affect aggression in children ages 0 to 18.¹⁶ In addition, the National Institute of Mental Health¹⁷ and two Surgeon Generals of the United States¹⁸ have published reports in agreement with these findings and the U.S. Congress gave credence to these findings in the Telecommunications Act of 1996 when it wrote, “Studies have shown that children exposed to violent video programming at a young age have a higher tendency for violent and aggressive behavior later in life than children not so exposed, and that children exposed to violent video programming are prone to assume that acts of violence are acceptable behavior.”¹⁹

3. Critiquing the Critics of Media Effects

Despite this wealth of evidence, the critics, in their respective comments in this proceeding, claimed that there is not sufficient evidence to conclude that viewing violent

¹⁶ Gentile, D. A., Oberg, C., Sherwood, N. E., Story, M., Walsh, D. A. & Hogan, M. (2004). “Well-Child Visits in the Video Age: Pediatricians and the American Academy of Pediatrics’ Guidelines for Children’s Media Use” *Pediatrics* 114, pp. 1235-1241.

¹⁷ Pearl, D., Bouthilet, L., & Lazar, J. (1982). Television and behavior: Ten years of scientific progress and implications for the eighties. (Washington, DC: U.S. Government Printing Office.)

¹⁸ Surgeon General’s Scientific Advisory Committee on Television and Social Behavior (1972). Television and growing up: The impact of televised violence. (Washington, DC: U.S. Government Printing Office.) Surgeon General (2001). *Youth violence: A report of the Surgeon General*. Rockville, MD: U.S. Department of Health and Human Services.

¹⁹ § 551 (a) (4).

television can cause harmful effects for children. Many of these groups offer support for their arguments by referencing the work of Jonathan Freedman²⁰ as well as the Federal Trade Commission's 2002 report, *Marketing Violent Entertainment to Children*,²¹ which relies solely on Freedman's review to support its assertion that insufficient empirical evidence exists to indicate media violence can cause violent behavior. Since the majority of critiques of this body of research originate from one single source, the Coalition will focus its attention on the arguments of Jonathan Freedman.

It is important to note that Freedman, though a social scientist, has personally never conducted any empirical research on the effects of media violence, but has attempted to prove that there are no harmful effects of viewing media violence by critiquing the work of others. In 1984, Freedman published a review criticizing the research in this field and concluding that the research was flawed and therefore could not be used to prove the effect of media violence on aggression.²² In the 20 years since the publication of this article, no other scientific scholar has published work that offers a similar analysis or even supported Freedman in his claims. Freedman appears to be completely isolated from his professional peers in his skepticism.

In 2002 Freedman authored a book, *Media Violence and Its Effects on Aggression: Assessing the Scientific Evidence*, which was commissioned by the Motion Picture Association of America to serve as an update of his 1984 article. Freedman's conclusion that media violence does not cause aggression must be weighed with the fact

²⁰ Freedman, J. L. (2002). *Media violence and its effects on aggression: Assessing the scientific evidence*. Toronto: University of Toronto Press.

²¹ Federal Trade Commission (2002). "Marketing violent entertainment to children: a twenty-one month follow-up review of industry practices, in the motion picture, music recording, and electronic gaming industries: A report to Congress." Last viewed on <http://www.ftc.gov/reports/violence/mvecrpt0206.pdf>, November 10, 2004.

²² Freedman, J. (1984).

that he was paid to produce this work by an organization with tremendous political and financial interests in the outcome of this debate. Freedman's objectivity is certainly deserving of scrutiny.

L. Rowell Huesmann and Laramie D. Taylor offer a compelling critical analysis of Freedman's book²³ in which they identify several ways that Freedman misunderstands, misrepresents, and misinterprets the existing body of research to arrive at his conclusion (See Appendix A). First, Huesmann and Taylor explain that though Freedman does point out some important methodological flaws in some of the studies, he often dismisses the findings of some studies based on personal value judgments rather than facts. For example, when unable to explain away the results of a study that contradict his personal theory, he states, "It is a complicated study with very complicated results. I am confident that, overall, these results do not show that exposure to media violence increases aggression."²⁴ This is hardly a scientifically sound method of assessment.

Second, Freedman does not employ scientifically accepted review techniques, such as meta-analysis, which combine and analyze data from multiple studies to create a composite assessment, nor does he acknowledge existing meta-analyses that have findings contrary to his thesis. Instead, Freedman picks and chooses the studies and pieces of studies that he analyzes and often shifts his criteria for evaluating them depending on whether or not he agrees with their findings. As a result, Freedman greatly weakens the scientific value of his review.

²³ Huesmann, L. R. & Taylor, L. D. (2003). For an analysis of Freedman's 1984 review, see Friedrich-Cofer, L. & Huston, A. C. (1986). *Television violence and aggression: The debate continues*. Psychological Bulletin, 100 (3), pp. 364-371.

²⁴ Freedman, J. (2002) p. 29; as quoted in Huesmann, L. R. & Taylor, L. D. (2003) p. 117.

Third, Freedman does not acknowledge any of the psychological theories that explain the relationship between violent media and aggression. Huesmann and Taylor explain that if he did, he would have to explain inconsistencies between his theories and accepted psychological laws, such as the fact that all primates have a tendency to imitate observed behavior, even from an early age. It is possible that Freedman could argue that viewing behavior on television would not have the same effect as viewing others' actions in real life, but then one must ask how he would reconcile such a belief with the fact that the advertising industry depends on such imitative behavior for its existence?

Fourth, Freedman's arguments depend on a common assumption that those who contend that media violence causes aggression believe that media violence is the only cause of aggression. This assumption enables Freedman and others to claim that media violence cannot affect behavior because all people who see the same violent material do not react with the same amount of aggressiveness. The fact is that no reputable scientist has ever suggested that media violence is the only cause or even the most important cause of aggressive behavior. To the contrary, the general consensus is that it requires a convergence of many personal and environmental factors to elicit serious aggressive behavior. Media violence can simply be one of them.

Finally, and perhaps most importantly, Huesmann and Taylor point out that, although he may not state it explicitly, even Freedman accepts "some of the most important fundamental empirical facts about media violence viewing and aggression—that they are correlated and that exposure to media violence causes increases in aggressive behavior, at least in the short run."²⁵

²⁵ Id. at 121.

Based on the overwhelming scientific evidence of a causal effect of violent media on aggressive behavior and given the strong case refuting Freedman's claims that the research in this area is invalid, the Coalition recommends that the Commission reject the positions of the critics and act on this proceeding in a manner that will serve to protect children from the harmful effects of media violence.

III. THE V-CHIP AND RATINGS SYSTEM REMAIN VITALLY NECESSARY AS THE "LEAST RESTRICTIVE" MEANS OF ACHIEVING THE "COMPELLING GOVERNMENTAL INTEREST" OF EMPOWERING PARENTS

The Coalition was pleased that media industry leaders, including the National Association of Broadcasters ("NAB"), and the American Advertising Federation, American Association of Advertising Agencies, Association of National Advertisers, Inc., Motion Picture Association of America, and the Satellite Broadcasting and Communications Association ("Media Associations") appear reasonably supportive of the Coalition's recommendation to improve the ratings and V-chip system.

For example, the NAB comments assert that, "The V-chip and program ratings system...present significantly less speech restrictive ways to assist parents in supervising their children's viewing without suppressing the content of television programming for everyone."²⁶ The Media Associations also explain how the government itself has determined the ratings and V-chip to be a less restrictive means, and that government "must give less intrusive alternatives a chance to work, and explain why less burdensome

²⁶ Comments of the National Association of Broadcasters v., MB Dkt. No. 04-261, filed Oct. 15, 2004 ("NAB Comments").

alternatives would fail....”²⁷ Media industry leaders recognized that the ratings and V-chip system are the least intrusive, and thus, the best, options available to moderate children’s exposure to television violence. Therefore, the Coalition recommends that improvements in the V-chip and ratings system should be attempted before any other alternative is considered.

The Coalition disagrees with the assertion by the Media Associations and NAB that the ratings and V-chip system have fulfilled their purpose as a tool for parents, and that low usage is not a failure of the technology, but a result of parents’ choosing to use other tools instead. The Coalition maintains that the low usage of the V-chip and TV ratings is due largely in part to the fact that many parents still are not aware that the tools exist. According to the 2004 Kaiser Family Foundation study, *Parents, Media and Public Policy*, one in five parents (20%) said they had never heard of the TV ratings system, an increase from 14% of parents in 2000 and 2001.²⁸ Half or less of parents could identify the content-based ratings, “V” (51%, violence), “L” (40% language) “S” (37% sex) and “D” (4% suggestive or sexual dialogue) and more than three-quarters of parents of young children (76%) could not identify any of the ratings that would identify a program that is appropriate for their children.²⁹ Furthermore, nearly four in ten parents with recently purchased televisions (39%), were unaware that their new television had a V-chip in it.³⁰

Research shows that parents who use the television ratings system find it useful. According to the Kaiser Family Foundation study, half of all parents have used the

²⁷ Comments of The Media Association 63, MB Dkt. No. 04-261, filed Oct. 15, 2004 (citing *Denver Area Educ. Telecomms. Consortium v. FCC*, 518 U.S. 727, 758-59 (1996)).

²⁸ Kaiser Family Foundation, *Parents, Media and Public Policy: A Kaiser Family Foundation Survey*, (Menlo Park, CA: Kaiser Family Foundation, September 2004).

²⁹ *Ibid.*

³⁰ *Ibid.*

television ratings, and 24% report that they use them “often” to help make decisions about their child’s viewing.³¹ About nine out of ten parents (88%) find the ratings “useful” or “very useful.”³² Furthermore, of the parents who are aware that their television has a V-chip, almost half (42%) say that they have used it, and the vast majority of those parents (89%) found it useful, with 61% finding it “very useful.”³³

The Coalition generally agrees with other commenters, including the Coalition for Independent Ratings Services, Tim Collings and Morality in Media, that improvements need to be made to the ratings and V-chip system in order for them to function effectively. The Coalition was pleased to note the broad-based support among commenters, such as the Center for Creative Voices in Media and the NAB, for a public education campaign about the ratings and V-chip system. Given the lack of parental knowledge about the ratings and the V-chip, a public education campaign is clearly needed. Broadcasters are uniquely capable of educating parents with public service announcements. The FCC has a responsibility to ensure that broadcasters fulfill their obligations to the public, particularly in areas directly relating to the impact of media on the public. Given conclusive evidence about the negative impact that portrayals of violence have on children, the Coalition strongly recommends that the FCC work with broadcasters to create a public education campaign about the ratings and the V-chip system. Such a campaign would be one of the least burdensome methods available to reduce the impact of television violence on children.

³¹ *Ibid.*

³² *Ibid.*

³³ *Ibid.*

IV. THE V-CHIP'S ABILITY TO FIND PROGRAMMING SHOULD BE IMPLEMENTED AND MADE AVAILABLE TO PARENTS

In his comments, Tim Collings recommends that the V-chip be used by parents not only to block programs they deem inappropriate for their children, but also as a tool to enable them to find educational and informational (E/I) programming.³⁴ The Coalition supports an open V-chip system that would enable parents to proactively find E/I programs on-demand. The Coalition also supports the use of interactive technology to provide links to information explaining the meaning of ratings, the reason for a program's rating and instructions on how to use the V-chip. Further, the Coalition reiterates our earlier comments that the FCC should mandate an "open" V-chip system that would allow a broader range of ratings systems to be supported by digital television sets.³⁵

V. CONCLUSION

The Coalition urges the Commission to consider the full body of research on media effects and the well-established consensus that a causal relationship exists between viewing violent media and engaging in violent or aggressive behavior. Critics of media effects research have depended primarily on the writings of one person, whose objectivity, methodology and conclusions have been called into question. The opinion of a handful of critics should not supercede the Commission's responsibility to protect our nation's children. As Surgeon General Jesse Steinfeld told Congress in 1972,

"It is clear to me that the causal relationship between [exposure to] televised violence and antisocial behavior is sufficient to warrant

³⁴ Tim Collings Comments at 5.

³⁵ Children Now, *Children's Television Obligations of Digital Television Broadcasters*, Notice of Proposed Rulemaking, MM Docket No. 00-167, submitted April 21, 2003, pgs. 22-23.

appropriate and immediate remedial action...there comes a time when the data are sufficient to justify action. That time has come.”³⁶

The Coalition therefore urges the Commission to improve upon the technology and resources that are currently offered to parents, such as the television ratings system and the V-chip. By taking steps to increase the awareness and use of such tools, improve the ratings reliability and make the V-chip more useful, the television industry and the Commission can better serve the needs of parents and avoid the need for further regulatory action.

³⁶ Steinfeld, J. (1972). Statement in hearings before Subcommittee on Communications of Committee on Commerce (United States Senate, Serial nos. 92–52, pp. 25–27). Washington, DC: United States Government. As quoted in Huesmann, L. R. & Taylor, L. D. (2003).